

Tina LePage

CTS: 336649

From: Ronnie Hawks <RPH@jhc-law.com>
Sent: Tuesday, July 15, 2014 11:31 PM
To: Tina LePage; Anthony E. Young (anthony.young@azag.gov)
Cc: Karen Gaylord; Christopher D. Thomas (chris.thomas@squirepb.com); (chris.thomas@squirepb.com); David Armstrong (ArmstrongD@ballardspahr.com); John Barkett (jbarkett@shb.com) (jbarkett@shb.com); molly.cagle@bakerbotts.com; Jerry Worsham; 'Consoli, Carla'; 'Drazek, Joseph A.'; 'Mitchell Klein'; 'Roger Strassburg'; 'Van Wolf'; 'Troy B. Froderman (tfroderman@polsinelli.com)'
Subject: West Van Buren Working Group Orphan Search
Attachments: 2014-07-15 WVB Wkg Grp Orphan-PRP Database.xlsx; 2014-07-15 WVB Wkg Grp Ltr to ADEQ and AG.pdf

R: 53601
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Tina and Tony, I have attached an Excel spreadsheet with the results of the West Van Buren Working Group's orphan search and a cover letter providing information on the scope and results of the search. We will be forwarding hard copies of the letter to you both along with DVDs containing the source documents for the information in the table. The Working Group looks forward to discussing the results of this search with you.

Ronnie P. Hawks
Jennings, Haug & Cunningham, LLP
2800 N. Central Ave., Suite 1800
Phoenix, AZ 85004
602.234.7800 (main)
602.234.7802 (direct)
602.430.8524 (mobile)

For further information regarding Jennings Haug & Cunningham, LLP, please refer to our website at www.jhc-law.com

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Karen S. Gaylord
602-234-7808
ksg@jhc-law.com

July 15, 2014

Via Email: Anthony.young@azag.gov
Lepage.tina@azdeq.gov

Anthony E. Young, Esq.
Assistant Attorney General
Office of the Attorney General
1275 West Washington Street
Phoenix, AZ 85007

Tina LePage
Manager, Remedial Projects Section
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

Re: *West Van Buren Working Group Orphan Search*

Dear Mr. Young and Ms. LePage:

The West Van Buren Working Group is an unincorporated association of regional stakeholders interested in ADEQ's selection of a remedy for the West Van Buren WQARF Site. The Working Group's common consultant recently submitted to ADEQ a Feasibility Study and proposed remedy for the Site. The Working Group now submits the accompanying table, source documents, and background information to supplement the PRP search that ADEQ has conducted for the Site. We believe it contains significant new information about orphan facilities and other PRPs. We hope it also contains information that will be helpful to ADEQ in its efforts to oversee source control efforts for the site.¹

¹ The manner in which the table was compiled resulted in the inclusion of entities listed in the West Van Buren Remedial Investigation Report, ADEQ industrial surveys, and entities that have been historically involved in the Motorola 52nd Street Superfund Site who are not "orphans" as that word is used in the WQARF statute. Because of time constraints, extracting these entries from the orphan table was not feasible.

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Scope and Background

1. Search Area

Because the groundwater trough created by RID pumping influences the entire West Van Buren area and has done so for many decades, sites with the potential for releases of COCs within that entire area were included. This includes (1) some facilities that are outside the current ADEQ WVB plume boundary to the north, south to the Salt River, and to the east between M52 OU3 and the ADEQ WVB plume; and (2) several previously-uninvestigated areas that either ADEQ or the Working Group's common consultant indicated interest in as potential ongoing source areas.

Because ADEQ has indicated that it believes contaminants from M52 may have contributed to the WVB plume historically, the Working Group's search included M52 OU3 facilities, and even though it is a matter of contention, facilities located in OU2 and some in OU1. We also searched areas to the south of OU2 and OU3 down to the Salt River.

Because ADEQ has indicated that facilities in the West Central Phoenix WQARF areas may have contributed to contamination in WVB, the Working Group also conducted a limited search of facilities in that area.²

2. Sources of Information

The Working Group did not conduct a comprehensive PRP search. The information being provided today was gathered as part of an expedited review of sources that were reportedly not accessed by ADEQ, and should be considered along with other information already included in ADEQ's PRP search. Because this review was expedited, there was insufficient time to exhaust all available information. For example, the City Of Phoenix has voluminous records of facility applications and incident reports. Review of these records is slow and difficult. Only a portion of these records was reviewed. We have included below a more detailed list of sources reviewed, as well as a list of additional valuable sources of information that could not be reviewed in the time available. These are recommended to ADEQ for further consideration.

The Working Group attempted to focus its efforts on sources of information that do not appear to have been accessed by ADEQ. It is our understanding, based on

² The collective area included with the Working Group's search is hereafter referred to collectively as the "Orphan Search Area."

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information from the Attorney General's office, that ADEQ already has investigated the sources in Table 1 in its WVB PRP search. In addition, we understand that ADEQ conducted limited review of the EPA Superfund Management System database, Baker-Lofgren litigation files, and reported cases.

TABLE 1: Records Accessed by ADEQ

ADEQ Enforcement Records
ADEQ Inspection Records
ADEQ Drywell Database
ADEQ Compliance Logs
ADEQ UST/LUST Files
ADEQ DEUR Database
City/Business Directories
Historical Yellow Pages directories
Historical newspapers
City of Phoenix Fire Department Records
City of Phoenix Wastewater/Industrial Discharge Records
Maricopa County Environmental Services Septic Records
Maricopa County Air Quality Records
Chemical Waste Manifests
Chemical Purchase Records

For its review, the Working Group first retained EDR to provide a database search of the WVB area, including historical city directory listings. The resulting report has been provided in the attached DVDs. The Working Group followed up with a review of the following sources:

- City of Phoenix Fire Department Records. Although ADEQ requested these records from the City of Phoenix, our understanding from fire department personnel is that ADEQ was only given hazardous material permits and occupancy records. Therefore our review included some of the records that were not provided to ADEQ, including hazardous material permit applications, incident and inspection reports, MSDSs in the file, and similar records.
- City of Phoenix Wastewater Records: Our review included partial review of both industrial discharge and commercial discharge records.
- Hill Brothers Chemical Company Invoices. ADEQ apparently reviewed some limited chemical purchase records, but it was not clear that ADEQ reviewed Hill Brothers invoices disclosed during the Baker-Lofgren litigation. These

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records identified numerous facilities that purchased and used PCE, TCE and TCA in the 1960s, 1970s, and 1980s.

- ADEQ's 2006 Drycleaner Inventory Report.
- ADEQ hazardous incident, drywell and DEUR databases.
- City of Phoenix Environmental Assessments. The City has performed dozens of EAs over the years for property in OU2 and OU3 and made many of those EAs available for the Working Group's review.
- Maricopa County Air Quality Records.
- EPA's ECHO database and associated enforcement and Toxic Release Inventory reporting databases.
- ADEQ's Toxic Release Inventory annual summaries for available years.
- Limited portions of the Baker-Lofgren litigation file.
- Limited portions of landfill litigation files, including parts of the Estes, Bradley, and Broadway-Pantano files.
- Historical city directories, including the Yellow pages, for select years above and beyond the information in the EDR report.

In addition, members of the Working Group provided information from their files relevant to facilities within the Orphan Search Area.

Chronologically, information sources were reviewed for entities operating as far back as the 1920s, although the focus was on entities operating after World War II, when use of chlorinated solvents increased exponentially in the United States.

3. Scope of Information Provided

The Working Group included facilities listed in the WVB RI and ADEQ's industrial surveys in order to make a more comprehensive database. But we did not focus on a review of available information for these facilities, especially those discussed in the WVB RI. The assumption was that these facilities are already known to ADEQ. On the other hand, no effort was made to eliminate those parties from the database or to redact information found for those parties. To the extent new information was found for those parties that ADEQ might not have seen, it has been provided. Every effort was made to present the information in a straight-forward, objective manner. No facilities, companies, or organizations were targeted - nor were any filtered from review.

An effort was made to refine the search results and eliminate irrelevant and duplicative information. For instance, the search revealed numerous office and commercial complexes that contained drywells but did not appear to conduct activities

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associated with solvent use. These and similar facilities were eliminated from the database. Another category eliminated from the database was historical entities whose business activities could not be determined and for which no documentation of chlorinated solvent use was found. Additionally, information on petroleum storage and distribution facilities, including gas stations that did not conduct auto maintenance, were eliminated except where there was evidence of solvent use. In all, well over 1000 entities were eliminated from the original tables after further investigation and review because they fell outside of the scope of the search.

4. Additional Information Sources

The Working Group is aware of additional sources of information that were not accessed during our expedited review. For instance, records may be available from a bankrupt aerospace company that operated locally. We also have electronic documents from historical litigation that are in an outdated format and are difficult, but not impossible, to access. We will provide relevant documents from that repository in a follow-up to this submittal.

Additionally, it is likely that significant relevant information can be found in sources that may already be available to ADEQ, such as the 19th Avenue Landfill litigation files, Baker-Lofgren litigation files, and Estes Landfill files. We also have been told that ADEQ is in possession of a complete copy of Maricopa County's historical septic tank records. We will provide any new information relevant to this search as it becomes available, but we encourage ADEQ to review these and other sources of information to which it has access.

Overview of Working Group Search Results

The table accompanying this letter includes information on approximately 3,800 individual businesses or entities that operated throughout the Orphan Search Area. Dates of operation range from the 1920s to present day. Although multiple entities often operated at a given address over time, the database still contains information on well over 2,000 individual street addresses.

Facilities were broadly categorized into several business or operational types. Although the categorization was in some cases relatively arbitrary, the results provide an overview of the relative number of entities in the industries reviewed in the search. A breakdown, in approximate numbers, of the business categories is provided in Table 2.

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Table 2: Business Categories and Facilities Found

Auto Maintenance & Repair	1025
Aviation Services	35
Chemical Manufacturing & Distribution	120
Dry cleaning & Laundry	525
Electronics Manufacturing & Repair	110
Food Industry	30
Furniture Manufacturing, Stripping & Finishing	30
Government & Military	70
Industrial Gas Manufacturing	15
Machinery Manufacturing & Repair	280
Manufacturing - Other	110
Mechanical and Architectural Contracting & Construction	55
Metal Working, Fabrication, Manufacturing & Plating	335
Other / Miscellaneous	215
Paint Manufacturing & Distribution	50
Painting & Coatings	30
Petroleum Storage & Distribution (solvent use indicated)	15
Plastics Manufacturing	35
Plumbing, Heating & Air Conditioning	35
Printing, Publishing & Copying	175
Roofing, Pavement & Asphalt	30
Testing & Laboratories	40
Transportation & Warehousing	174
Unknown	300
Utilities	25
Waste Management, Recycling & Reclamation (includes auto salvage)	145

Without delving into a detailed analysis of the search results, the following sections provide a brief summary of the information collected on a few industry segments that are known to have used chlorinated solvents historically. These are provided simply as examples of the types and amount of new information developed through this search that is relevant to the identification of PRPs and orphans.

1. Drycleaners

The Orphan search identified over 525 dry cleaning businesses that operated historically within the Orphan search area, representing approximately 13% of all

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facilities identified in the search. Operating dates could not be determined for approximately 60 of the facilities listed. These facilities existed at approximately 360 separate addresses within the search area and represent both large industrial cleaners and small neighborhood shops. Of the 525 drycleaners in the database, ADEQ had previously evaluated approximately 35 of them in its investigative reports to date on WVB. Specific documentary evidence of PCE, TCE or TCA use was found for over 150 of the remaining approximately 490 facilities.

Many of the dry cleaning facilities in the orphan list were identified in ADEQ's 2006 inventory of Arizona dry cleaning facilities. But this orphan search identified many facilities that were not included in that inventory, including approximately 150 facilities that operated after 1946.

2. Automotive Repair & Maintenance

Historically, a wide variety of solvents have been used to clean engines and parts in the automotive and transportation industries. Cleaning involved both vapor degreasing and cold cleaning. Solvents used ranged from alcohol to petroleum-based products to chlorinated solvents.³ Numerous auto repair shops and garages in the Orphan Search Area bought PCE, TCA and TCE in bulk during the 1960s, 1970s and 1980s, as evidenced in the Hill Brothers Chemical Company invoices provided with this letter. This same documentation indicates that numerous other auto repair facilities used Safety Kleen solvent degreasing systems, which are known to have contained COCs in some earlier formulations. Furthermore, all of these facilities would have used aerosols, cans of brake and carburetor cleaner, and similar products that contained COCs.

The search found over 1,000 facilities believed to be involved in automobile maintenance and repair. Of these, less than 75 appear to have been evaluated by ADEQ in previous WVB PRP searches and inventories.

3. Machinery-Manufacturing and Repair Facilities

Approximately 280 machinery-manufacturing and repair facilities were identified in the orphan search area. These facilities ranged from small, family-owned shops to large industrial facilities. Many of the facilities manufactured parts and machinery for the aerospace and defense industries. The search identified documented use of PCE, TCE, or TCA at 44 facilities not previously identified by ADEQ.

³ Morrison and Murphy, *Chlorinated Solvents*, at 292-312 (2013).

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Of the approximately two dozen machinery-manufacturing facilities identified inside the WVB plume, it appears that about five or six have been previously identified by ADEQ. At least five of the newly-identified facilities are known to have used TCE, TCA or other solvents.

Another two dozen or so machinery-manufacturing and repair shops were identified in the area north of the WVB plume, along the Grand Avenue corridor and to the west. Only one of those appears to have been previously identified by ADEQ. At least ten of these facilities are known to have used TCE, PCE, TCA or other solvents. The bulk of these facilities are located within OU3 and OU2 or to the immediate south, with approximately 170 machinery manufacturing and repair facilities identified in the two OUs.

4. Metal Plating, Working, Welding, and Fabrication

Approximately 340 metal plating and coating operations, metal working shops, sheet metal fabricators, foundries, welding shops and similar operations were identified within the search area. ADEQ appears to have previously identified approximately 55 of those facilities in its investigation of the WVB area. Evidence exists for more than 65 of the remaining facilities demonstrating that those facilities used PCE, TCE or TCA.

Key to Database and Source Documents

With this letter, the Working Group is providing to ADEQ several DVDs containing the information collected during our search in electronic format. First, there is an Excel spreadsheet with several tabs. The first tab contains a complete listing of facilities by facility address. The following tabs break down the list into business categories for easier review.

The spreadsheet contains the facility address and operator name; the current site owner and parcel information where available; business categories; and regulatory program identifying numbers where available. In addition, there is a column indicating whether the facility appears to have been previously assessed by ADEQ in its WVB investigation. There is a column for notes with relevant significant information about the site or facility and a column indicating source documents for the information in the spreadsheet.

The Working Group has checked the information for accuracy, but due to the scope of this review and the expedited time period in which it was conducted, some errors, inconsistencies or omissions may not have been corrected. As part of its continuing review, the Working Group will update the table as it identifies any such errors or omissions in the table and will advise ADEQ accordingly.

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The Working Group plans to convert the information in the spreadsheet into an Access database file to assist ADEQ in integrating the information into existing PRP databases that the agency might maintain. If another format would be better, we would be happy to discuss that with ADEQ. Once the information is in a database, the Working Group intends to generate a series of maps to assist in the review of the information. Any database or maps generated will be provided to ADEQ at a later date.

Very truly yours,



Karen S. Gaylord
Ronnie P. Hawks

RPH/lm

cc: David Armstrong, Ballard Spahr LLP, Counsel for Salt River Project
Joe Drazek, Quarles & Brady LLP, Counsel for Univar
Troy Froderman, Polsenelli, and Mitch Klein, Snell & Wilmer LLP, Counsel for Dolphin Inc.
Chris Thomas, Squire Patton Boggs LLP, Counsel for City of Phoenix
Carla Consoli, Lewis Roca Rothberger, Counsel for Prudential Overall Supply
Molly Cagle, Baker Botts LLP, Counsel for APS
Jerry Wosham, Ridenour, Hinton & Lewis, PLLC, Counsel for Schuff Steel
Van Wolf, Salmon, Lewis & Weldon PLC, Counsel for Air Liquide
Roger Strassburg, Roger Strassburg, PLLC, Counsel for Milum Textile Services
John Barkett, Shook, Hardy & Bacon LLP, Counsel for Freescale Semiconductor

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